

Attachment 4

Inspection Plan

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F.2 Inspection Schedule

This Section outlines the schedule for inspection of monitoring equipment, safety and emergency equipment, security devices, and operating and structural equipment that are vital to prevent, detect, or respond to environmental or human health hazards in accordance with IDAPA 58.01.05.012 and 58.01.05.008 (40 CFR §§270.14.(b)(5), and 264.15, and 264.33). The Section also addresses specific inspection areas in detail and contains examples of the inspection forms used at the facility. Table F-1 outlines inspection frequencies for each area of the facility.

F.2.a General Inspection Requirements

The following paragraphs identify facility equipment and operating areas, identify potential problems, and outline measures to prevent the occurrence of these problems. A copy of the completed inspection forms and the inspection schedule are kept at the facility. Completed inspection summaries are maintained for a period of at least three (3) years from the date of inspection.

As necessary, the format of the inspection forms may be modified from time to time to address ongoing inspection assignments. The intent of these changes would be to modify the organization of inspection forms as determined by implementation of inspection procedures. Changes to the inspection format would not require a formal permit modification since the content of the inspection forms/procedures would not be altered. Specifically, USEI can make changes to an inspection form if the revised form is "superior or equivalent" and the appropriate justification is placed in the operating record. The format of tables, forms, and the orientation of figures are not subject to the requirements of this Permit, and may be revised at USEI's discretion. Any formatting change to inspection forms will be submitted to the DEQ for their records. Changes to the content of the inspection forms may require a formal Class 1, 2 or 3 Modification depending on the type of changes proposed.

F.2.a.(1) Types of Problems

Regular inspections are conducted to identify equipment malfunctions, structural deterioration, operator errors, uncontrolled run-off, leachate generation, or other discharges that could cause or lead to the release of hazardous waste constituents or that may threaten human health or the environment. The purpose of these inspections is to detect potential problems and to correct them before they result in a release of hazardous waste constituents and/or cause harm to human health or the environment.

Table F-1 presents the schedule of routine inspections for the various components/units critical to the proper operation of the facility. These inspections are considered important because of their role in preventing, detecting, or responding to environmental or human health hazards. Specific inspection items and potential problems associated with each inspection area are referenced in the following paragraphs as well as on each individual inspection form.

F.2.a.(2) Frequency of Inspections

The facility's inspection schedule was developed based on applicable regulatory requirements, estimated rate of potential equipment deterioration, and the probability of an environmental or human health incident if any equipment deterioration, malfunction, or operator error were to go undetected between inspections. Table F-1 identifies the inspection frequency for each of the various facility components/units. The frequency of the scheduled inspections is based on a probability of an occurrence of an incident or malfunction and is designed to minimize the need to implement the facility's Contingency Plan.

All facility units in which waste is actively being handled will be under surveillance for spills, malfunctions, and operator error during active operations. The activities discussed in the following paragraphs are more formal, documented procedures to support and verify these operational inspections.

In all active waste handling areas, a daily inspection is performed when the area is in use (i.e.; each operating day). Other areas are subject to weekly or monthly inspections.

For specified areas, identified in Table F-1, inspections are also performed after storm events of 0.50 inches of precipitation in 24 hours.

In accordance with IDAPA 58.01.05.008 (40 CFR §264.15), any deterioration or malfunction of equipment or structures that may cause or lead to the release of hazardous waste constituents or threaten the environment or human health will be corrected utilizing interim corrective measures, if necessary and final corrective measures. Where a hazard is imminent or has already occurred, action is taken expeditiously. Response actions for contingency procedures are provided in detail in the Contingency Plan.

F.2.b Unit-Specific Inspection Requirements

F.2.b.(1) Container Management Unit Inspection

Figures F-1, F-5, F-6, F-7, F-19, F-20, [and F-21](#) [and F-22](#) are the inspection forms for the Container Management Units (CMUs), including:

- Container Storage Area 1 (CSA #1)
- Container Storage Pad 4 (CSP #4)
- Container Storage Pad 5 (CSP #5)
- RCRA(Pad 7)/PCB Storage Building
- Stabilization Facility
- Truck Unloading Aprons #'s 1 and 2 (Containment Building - Stabilization portion)
- Truck Unloading Apron #3 (Containment Building)

Containers may also be managed within the Containment Building as described in paragraph F.2.b(9).

Inspections of these units are conducted at the frequencies shown in Table F-1.

The CMUs are inspected for the presence of spilled material, leaking containers, and for deterioration of either the containers or the containment. If any of these conditions exist, corrective activities are instituted to clean up and limit the potential spread of material, and/or restore the integrity of the container or containment system. The CMUs and their associated containment systems are also visually inspected for the presence of cracks and gaps that could result in loss of containment effectiveness. Should structural problems occur that would allow leakage out of the unit or between compatibility segregation areas, or that may develop into a major failure, wastes would be relocated as necessary and repair activity will be initiated. CSA # 1 will be inspected for proper drainage controls. During scheduled inspections, the CMUs and their associated waste staging loading and unloading areas are visually inspected to determine that adequate aisle space is maintained. Individual containers are also inspected in preparation for the storage of wastes with a different waste compatibility class. Individual containers in the CMUs, subject to Subpart CC requirements, are inspected for Level 1 compliance. In this case, the area is checked to determine if any waste residue remains to an extent that it may react with wastes of a different compatibility class and require decontamination of the area prior to its change of use.

The CMUs (including trenches and containment system sumps) are inspected for the presence of liquids/solids. Spilled solids are removed in accordance with the requirements of the Contingency Plan. Liquids discovered in the collection trenches on the truck unloading aprons at the Containment Building are removed within 48 hours of discovery. If necessary, absorbent materials are utilized to absorb standing liquid for proper disposal. If necessary, sampling and analysis of materials removed from the containment areas is conducted in accordance with Section C.2 of the facility WAP.

F.2.b.(2) Tank System Inspection

Figure F-2 is the inspection form for the RCRA tank system (T-1, T-2, T-3, and T-4) and associated piping. Figure F-2a is the daily inspection form (when in use) for the Containment Building- Stabilization Portion Mixing Bin Tanks (MBT-1, MBT-2, MBT-3, MBT-4).

F.2.b.(2)(a) Tank System External Corrosion and Releases

All permitted external tanks, piping, valves, and connections are visually inspected for signs of leakage, corrosion, or structural deterioration. The leachate piping from landfill cells to the tanks, and from the tanks to the Evaporation Pond are inspected only when in use (i.e., when material is being transferred). Should discrepancies be identified, corrective measures would be implemented.

F.2.b.(2)(b) Tank System Construction Materials and Surrounding Area

The area immediately surrounding the externally accessible portion of the tanks, including the secondary containment, is inspected to detect any erosion or releases. Should any signs of significant erosion or a release be detected, corrective measures will be implemented.

F.2.b.(2)(c) Tank System Overfill Control Equipment

Overfill prevention devices and pressure/vapor venting equipment on tanks are checked for proper operation. Valves are also checked for closing and securing mechanisms, and tank labels are checked for correctness. Additionally, liquid level indicators on all tanks are inspected to verify they are functioning and that no leaks or obstructions have developed.

F.2.b.(2)(d) Tank System Monitoring and Leak Detection Equipment

All tanks and piping are above ground and do not have leak detection equipment. Although above ground piping is not required to employ leak detection equipment, in accordance with IDAPA 58.01.05.008 [40 CFR §264.193(f)(1)], secondary containment systems for the tanks do require leak detection (IDAPA 58.01.05.008 [40 CFR §264.193.(b)(2) and (c)(3)]). All monitoring and leak detection is done by visual inspection, as described in paragraphs F.2.b.(2).(a), (b), and (c).

F.2.b.(2)(e) Tank System Cathodic Protection

Not Applicable. All tanks are above ground.

F.2.b.(2)(f) Additional Tank System Inspection

The structural condition of the tanks are periodically ultrasonically tested per the frequency shown in Table F-1. Inspections of the interior condition of tanks require transfer of the entire contents of each tank and temporary removal from service.

Ultrasonic testing is performed on all steel tanks to obtain wall thickness. A minimum of two (2) representative thickness measurements are obtained in each ring section. If there is more than one plate per ring, at least one (1) representative thickness reading is obtained from each plate. Two (2) representative thicknesses are also obtained for the top and bottom tank shells. These tests are performed by a qualified testing company in accordance with current industry standards.

Tank testing results and the maintenance records of equipment and structures used in the tank system are maintained at the facility for a minimum of three (3) years.

F.2.b.(3) Waste Pile Inspection

Not Applicable.

F.2.b.(4) Surface Impoundment Inspection

Figure F-3 is the inspection form currently used for surface impoundment inspections (Collection Pond #'s 1 and 3 and Evaporation Pond) in accordance with IDAPA 58.01.05.000 (40 CFR §§264.226(b), 264.226(c)).

F.2.b.(4)(a) Condition Assessment

Surface impoundments are visually inspected daily and after a 0.5 in. rain event for freeboard (overtopping control), dike integrity, structural integrity, leakage, erosion, and liner integrity. Surface impoundments are also inspected visually for any sudden and/or unaccountable loss of contents, signs of erosion, and containment system deterioration. Use of a double-lined impoundment design at the facility also serves as a leak detection system for each impoundment. This inspection includes the notation of the presence and volumes of liquids collected in the leak detection system, as well as any system malfunctions. Should the quantity of liquid detected in the system exceed the warning leakage rate (WLR), then the Response Action Plan (RAP) will be implemented. WLR's are listed in the RAP.

If a significant structural problem (as described in the following paragraphs) is detected, the contents of the impoundment may be removed, as necessary, to allow maintenance and repairs. Inspection activities are conducted per the frequency shown in Table F-1.

F.2.b.(4)(b) Structural Integrity

A structural integrity problem is defined as either dike deterioration sufficient to cause potential failure of the dike, a breach in the lining causing a recognizable loss of volume, or anchor trench failure. All surface impoundments are inspected for structural integrity, including areas of the dikes providing freeboard. The liquid level within the surface impoundment may be lowered to allow for in-place repairs. When the impoundment is out of service for more than six (6) months, the structural integrity of the containment dikes are inspected by a qualified engineer prior to returning the unit to service. In accordance with IDAPA 58.01.05.008 ((40 CFR §264.226 (c))), the qualified engineer provides a certification that states that the dikes will withstand the stress of the pressure exerted by the type(s) and amount(s) of material to be placed in the impoundment.

F.2.b.(5) Incinerator Inspection

Not Applicable. The facility does not have an incinerator.

F.2.b.(6) Landfill Inspection

Figures F-4, F-4d, F-4e, F-4f, F-4g, F-4h, F-4i, F-4j, and F-4k are the inspection forms utilized during the inspection of active landfill areas (Cells 14, 15, and 16). All inspections are conducted pursuant to IDAPA 58.01.05.008 (40 CFR §264.303(b)). Post-closure inspections are performed in accordance with paragraph I.3. of Section I (Closure/Post-Closure Plan). Figures F-4a, F-4b, F-4c, and F-4h are the inspection forms utilized during inspection of closed landfills (Cell 5, Trenches 10 and 11, and PCB Trench 4). Figures F-16 and F-17 are the post-closure inspection forms for Cells 14 and 15. Inspection activities are conducted per the frequency shown in Table F-1.

F.2.b.(6)(a) Run-On and Run-Off Control System

During landfill inspections, the landfill run-on/run-off control systems are inspected for evidence of deterioration, malfunction, or improper operation. Particular attention is given to the integrity of

containment dikes (where present) and to any blockage of the drainage channels, swales, culverts, and other drainage structures.

F.2.b.(6)(b) Wind Dispersal Control System

Wind dispersal and dust control measures at the facility are inspected for adequacy and effectiveness. This activity includes both a visual inspection and determination of whether the condition of any exposed waste is a wind dispersal issue. When sustained wind speed conditions exceeding 25 mph (25 mph average for an hour) are confirmed, the spreading of hazardous waste will cease, however, wind dispersal control activities may continue (asphaltic emulsion, non-hazardous wastes, non-hazardous liquids, or soil cover) and may be applied on the freshly spread landfill surface. Hazardous waste placement operations will resume only after the sustained wind speed condition is below 25 mph. Landfill cover is also inspected during this activity.

F.2.b.(6)(c) Leachate Collection and Removal System

Leachate collection and removal systems (LCRS) and secondary leak detection, collection, and removal systems (LDCRS) of Landfill Cells 5, 14, 15, and 16 are inspected for the presence of liquids using the inspection forms shown in Figures F-4e, F-4f, F-4g, F-4h and F-4i. In the event the quantity of liquid detected in the LDCRS exceeds the WLR, then the procedures defined in the RAP will be implemented.

The exposed liner surfaces (if any) are visually inspected for damage and monitored for operations that could affect the integrity of the liner.

F.2.b.(7) Land Treatment Facility Inspection

Not Applicable. The facility does not have any land treatment operations.

F.2.b.(8) Stabilization Facility Inspection

Figure F-5 is the inspection form utilized in the inspection of the Stabilization Facility

The truck loading and unloading areas are inspected for any obstructions or spillage. General housekeeping items in this area are also noted. Ramps are inspected for spillage, structural integrity, and obstructions. Sumps are inspected for the presence of liquid or waste material. Secondary containment (i.e., concrete) is also inspected for spillage and for cracks and gaps that could result in loss of containment effectiveness.

The Stabilization Facility equipment (e.g., silos and hoods) is visually inspected for proper operation and structural integrity. The Stabilization Facility is visually inspected for spills and any potentially unsafe conditions resulting from the lack of, or malfunction of, safety guards, shields, or controls. As this area is also used for container management, the inspection schedule for containers in storage in the Stabilization Facility is dictated by paragraph F.2.b.(1). This area is also utilized as a waste staging, loading, and unloading area and, as such, the inspection requirements for these areas of the Stabilization Facility are outlined in paragraph F.2.b.(10).(e).

F.2.b.(9) Containment Building Inspections

Figures F-6 and F-7, present the inspection forms for the Containment Building (the Stabilization and Debris portions). These forms provide a detailed listing of the inspection areas and potential

discrepancies for each area inspected. The Containment Building is operated in accordance with IDAPA 58.01.05.008 (40 CFR Part 264 Subpart DD).

The daily inspections of the Containment Building are performed only for those equipment/areas of the buildings in use on the day of the inspection (i.e., operational day). The daily inspections provide for an inspection of the areas directly affected by the operations at the containment buildings. As part of this activity, processing equipment, drip pans, containers, doors, floors, and walls are visually inspected for structural integrity. The work areas are also assessed for spillage and for general condition.

Inspections will be performed daily (when in use). All areas of the building (both Stabilization and Debris portions) must be inspected at least weekly. This includes the leak detection and dust collection systems located in the Containment Building.

Storage areas and containers within the Containment Building are inspected for integrity and any signs of leaks or spills as outlined in paragraph F.2.b.(1) of this Section. As these buildings are permitted as a Containment Building, most waste containers (excluding containers subject to 40 CFR Subpart CC controls) may be stored either open or closed. The air pollution control (APC) systems must be in operation for wastes to be stored in open containers. Containers subject to 40 CFR Subpart CC controls must be kept closed during storage, as applicable. The LCRS and/or LDCRS are inspected for liquids. Any pumpable liquids in the LCRS with a depth of 4" inches or greater (>4") are removed and the removed volume noted on the inspection form. Minor amounts of liquids from condensation are expected in these systems. Liquids in the LCRS and LDCRS are removed and properly disposed in accordance with Section C.2.4.8 of the facility WAP.

The concrete wear/work surface is expected to wear and develop spalling and/or cracking as a normal part of the operation. This wear is considered to be acceptable as the wear surface serves to protect the HDPE liner and does not in and of itself constitute the primary or secondary barrier for containment. Cracks in the working surface of the concrete are monitored periodically so they do not impair the safe operation of the containment buildings. Significant cracks in the concrete working surfaces are documented during the inspections and repaired as part of routine maintenance. The repairs are documented in the facility operating records.

The concrete wear surface associated with the primary barriers is inspected for cracks, gaps, corrosion or deterioration. Any distortion/displacement (horizontal) in the concrete surface in excess of ¾ inches, will be additionally inspected by a qualified engineer. Such review will occur within five (5) working days of initial discovery. After its initial discovery, a distortion/displacement of greater than ¾ inches will be checked monthly. If the distortion/displacement equals or exceeds 1½ inches, all activities in that section of the Containment Building will be suspended. At this point, a qualified engineer will be consulted to provide a determination as to which waste processing activities may proceed while appropriate repairs are being implemented (based upon visual inspection of the distortion/displacement) and to determine the criteria for resumption of normal operations in the affected areas. The engineer will provide a written structural assessment regarding the affected area. This assessment will include requirements for repair and an opinion as to the potential that the underlying HDPE liner has been damaged as a result of the distortion/displacement. Within ten (10) working days of receipt of the assessment report, USEI will prepare a work schedule for all required repairs and will submit the assessment report and repair work schedule to the Director. The assessment report, work schedule, and documentation of repair completion will be maintained on-site in the operating record as described in paragraph F.2.a.

In addition, the inspection will include visual verification that the bottom steel wear plate is not distorted and exposing the support media (gravelly sand) or causing the support media to shift and potentially become contaminated. If the media must be removed because of the distortion or damage to the bottom wear plate, it will be managed as detailed in Section D.

The two (2) Mixing Bin Tanks located in the Containment Building- Stabilization Portion and the two (2) Mixing Bin Tanks located in the Containment Building- Debris Portion are inspected daily (when in use) in accordance with 40 CFR Part § 264 Subpart J. This inspection includes the secondary containment systems liquid level (and removal, if appropriate), structural integrity such as damage, heaving or settling, spills and housekeeping. These inspections are documented on Figure F-2a.

~~The HEPA filters in the Containment Building will also be inspected at least annually.~~

~~F.2.b.(9)(a) Miscellaneous Unit Inspections~~

~~Figure F-6a presents the inspection form for the crusher system inside the Containment Building. The inspection plan has been set up for the days of operation only. If the unit is not operated, the daily Containment Building inspection will cover the basic needs of the crusher area (Figure F-6). The crusher system and structure will be visually inspected for proper operation, structural and mechanical integrity. The work areas will be assessed for spillage and potentially unsafe conditions to include proper housekeeping/decontamination as required. Any structural or significant equipment deficiencies noted during the inspections of the size reduction system and process equipment that may create or develop into a major failure shall require repair activity to be initiated. All electrical, mechanical and safety devices will be inspected for proper operations.~~

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F.2.b.(10) Other Area Inspections

The following paragraphs detail the inspection requirements for those miscellaneous items required for proper operation of the facility.

F.2.b.(10)(a) Vehicle Wash Area Inspection

The vehicle wash (site decontamination) area is inspected for significant equipment malfunctions, drainage problems or leaks, and for the presence of liquid in the sumps. Figure F-8 is the site vehicle wash inspection form.

F.2.b.(10)(b) Road, Drainage, and Run-On/Run-Off Inspections

Figure F-9 is the current inspection form utilized for access roads and drainage systems. Road, drainage, and run-on/run-off inspections are conducted at the frequency shown on Table F-1.

The condition of the facility roads are inspected to provide for the safe movement of materials within the facility. Any deterioration of the road system which is detrimental to waste transport or which may impact underlying past practice units is repaired as warranted.

Run-on/run-off control and drainage systems for the entire site, including specific units, are assessed for their operational integrity and function.

F.2.b.(10)(c) Gate/Fence Inspections

Figure F-10 is the inspection form for the gates and fences at the facility. The perimeter fence is checked for damage, obstructions, unsecured gates and evidence of forced entry, and all warning signs are inspected for legibility. Any substantive deterioration or malfunction of the fence, gates, signs, or locks is noted and corrected.

F.2.b.(10)(d) Scale Area Inspections

Figure F-11 is the inspection form for the scale area. The truck scale is used for weighing trucks that enter and leave the facility. No waste handling, loading or unloading is conducted in the truck scale area. The area surrounding the scales should be free of waste. In the event of hazardous waste spillage in either of the scale areas, the spill is promptly cleaned up and the area is restored to normal operating conditions.

F.2.b.(10)(e) Waste Staging/Unloading/Loading Area Inspections

Figures F-1, F-7, F-12, F-19, F-20, F-21, and F-22 are the forms utilized in the inspection of the various material staging/loading/unloading areas at the facility. These areas, listed below, which include:

- CSA # 1
- CSP # 4
- CSP # 5
- Pad 6
- RCRA(Pad 7)/PCB Storage Building
- Containment Building (Stabilization and Debris portion)
- Surface Impoundments
- Truck Unloading Apron #'s 1, 2 and 3 at the Containment Building
- Stabilization Facility and Stabilized Roll-Off Containers
- RCRA Tanks Area
- Cell 14
- Cell 15
- Cell 16

These areas were designed with containment and/or drainage capabilities to prevent off-site migration of material. To minimize potential spillage during unloading, loading, and mixing of waste, a combination of splash plates, elevated sidewalls, and covers are utilized with roll-on/roll-off containers. The structural integrity of these items is inspected when waste materials are being handled. The presence of adequate aisle space is also inspected.

F.2.b.(10)(f) Monitoring Well Inspections

Figure F-13 is the form utilized for inspection of monitoring wells located at the facility. Wells are inspected to verify they are locked and undamaged. Inspection activities are conducted per the frequency shown in Table F-1.

F.2.b.(10)(g) Leachate Treatment and Piping System Inspection

Figure F-24 is the form utilized for inspection of the leachate treatment system, located adjacent to Pad 4, and associated piping. The leachate treatment system is inspected for proper pressure gauge readings to ensure a consistent flow of treated and untreated leachate. The piping system is inspected for any damage, which may result in leaks.

F.3 Equipment Requirements

F.3.a Specific Equipment Requirements

In accordance with IDAPA 58.01.05.008 and 58.01.05.012 (40 CFR §§264.32 and 270), the facility is equipped with:

- Internal communication system (i.e., hand-held radios)
- ~~Air Horn Alarms~~Civil Defense Siren
- External communications such as ~~battery-operated telephones or~~ cellular telephones
- Portable fire extinguishers

- Additional fire control equipment, including water supply
- Spill control equipment
- Decontamination supplies

All equipment, ~~with the exception of the air horn alarm boxes,~~ is inspected per the frequency shown on Table F-1. ~~The facility air horn alarm boxes are inspected daily and noted on a separate log maintained at the facility.~~

F.3.a.(1) Internal Communications

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Figure F-14 is the form utilized for the inspection of communication equipment. The facility's two-way radios are continually in use; therefore, the operating status is known at virtually all times. Two-way radios are used by site security and operations personnel when they are working in active waste handling areas. The inspection of communication equipment is conducted at the frequency shown on Table F-1.

~~Air horn boxes containing hand-held air horns are located around the facility. Boxes are inspected daily to ensure that the horns are present and have not been accessed. Air horn locations~~ The facility is also equipped with a civil defense siren that can be heard throughout the facility. The siren is radio-controlled and can be activated by a radio key pad. ~~The siren location -are is~~ shown on Drawing # PRMI-T10.

F.3.a.(2) External Communications

Figure F-14 is the form utilized for the inspection of communication equipment. The facility is equipped with telephones that operate as the primary external means of communication. There is a telephone located at the security building that can be used by security personnel to contact local police and fire departments or state and local emergency contacts. Additional telephones are available at other locations throughout the facility. As the telephones on the site are continually in use as part of normal operations, their operating status is known at virtually all times. Cellular telephones may also be used at the facility. These telephones are not inspected on a regular schedule since they are in continual use.

F.3.a.(3) Emergency Equipment

Emergency equipment at the facility includes fire extinguishers, spill control kits, and decontamination equipment. General site emergency equipment is located throughout the facility to facilitate timely and adequate response to emergency situations.

All emergency equipment in active waste management areas is inspected to assess operable condition. Additionally, the remaining quantity of certain consumable emergency equipment is determined during inspection activities. Figure F-14 is the inspection form used for the emergency equipment inspection. Drawing # PRMI-T10 shows the location of emergency equipment. The emergency equipment maintained on site will change from time to time based on the types of waste managed and associated response procedures.

F.3.a.(4) Water for Fire Control

Figure F-14 is also the inspection form used for the tanks that store water for fire protection. The facility maintains two 16,000-gallon above-ground water tanks, and one 25,000-gallon above-ground water tank that store water for general site usage and in case of fire. A minimum of 16,000 gallons of water is maintained in these tanks to provide fire protection. Supplemental water is also maintained at the site's water holding pond located on Lemley Road. Additionally, an underground pipeline is utilized to transfer water from the holding pond to the facility water tanks.

F.3.b Aisle Space Requirement

US Ecology Idaho, Inc.
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Figures F-12 F-19, F-20, F-21, and F-22 outline inspections of staging/loading/unloading areas with respect to aisle space. During scheduled inspections of the CMUs, containment building units, and the waste staging, loading, unloading areas, visual inspection is made as required in paragraphs F.2.b.(1) and F.2.b.(10).(e) with regard to aisle space. Aisle space requirements are provided in paragraph D.1.c.(3).

and bulk shipments of solid and liquid wastes. Therefore, each type of waste shipment is addressed separately.